

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States Securities and Exchange
Commission,

Plaintiff,

Case No.: 21-cv-1445 (DSD/ECW)

v.

Mark A. Miller, Saeid Jaberian, and
Christopher J. Rajkaran,

Defendants.

**TO: Plaintiff United States Securities and Exchange Commission, through its attorney
Alyssa A. Qualls, 175 West Jackson Blvd., Suite 1450, Chicago, Illinois 60604**

Defendant Saeid Jaberian ("Jaberian"), *pro se*, hereby requests, in accordance with Rule 33 of the Federal Rules of Civil Procedure, that Plaintiff Securities and Exchange Commission ("SEC") serve answers to the following Interrogatories within thirty (30) days from the date of service.

INTERROGATORIES TO PLAINTIFF (FIRST SET)

INTERROGATORY NO. 1:

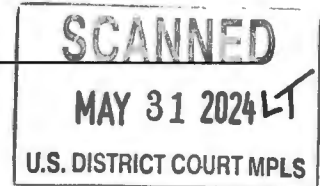
Please identify the CEOs and other insiders associated with the companies/stocks named in the Amended Complaint.

ANSWER:

INTERROGATORY NO. 2:

Please identify whether the SEC has communicated with any of the CEOs or other insiders associated with the companies/stocks named in the Amended Complaint.

ANSWER:



RECEIVED
MAY 31 2024
CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

INTERROGATORY NO. 3:

Have the CEOs of the companies/stocks identified in the Complaint, or any other insiders associated with the companies/stocks named in the Complaint bought or sold any shares of the stocks named in the Amended Complaint during the time period referenced in the Amended Complaint?

ANSWER:

INTERROGATORY NO. 4:

If the Answer to Interrogatory No. 3 above is yes, please identify the transactions, including the name of the CEO or insider, the dates of the transactions, the amount of shares, whether it was a purchase or sale, and the share price.

ANSWER:

INTERROGATORY NO. 5:

Has the SEC verified whether the Defendant in this matter is legally Mark Kilchesky or Mark A. Miller? Please identify all known aliases of the Defendant Mark Miller and please identify his legal name.

ANSWER:

INTERROGATORY NO. 6:

Please identify the transactions in support of the SEC's allegation in Paragraph 136 of the Amended Complaint that "Jaberian shared at least \$78,000 with Miller." In answering this

Interrogatory, please note that, according to the documentation that Jaberian provided to the SEC, Jaberian sent checks totaling \$155,238 to Mark Miller.

ANSWER:

INTERROGATORY NO. 7:

Please identify all bank and brokerage accounts for the following individuals and entities:

- a. Richard Kilchesky
- b. Jason Black
- c. PGA Group
- d. All other CEOs of the companies/stocks named in the Amended Complaint.

ANSWER:

INTERROGATORY NO. 8:

Please identify and describe all facts that explain why the SEC has not named Richard Kilchesky in the present lawsuit or any related action, despite Richard Kilchesky serving as the Chief Executive Officer of UITA, issuing a press release, purchasing shares in the open market, and apparently profiting from these transactions.

ANSWER:

INTERROGATORY NO. 9:

Has Richard Kilchesky realized gains from purchases and/or sales of the stocks named in the Amended Complaint?

ANSWER:

INTERROGATORY NO. 10:

Have any other Chief Executive Officers or insiders of the companies/stocks named in the Amended Complaint profited from the stocks named in the Amended Complaint?

ANSWER:

INTERROGATORY NO. 11:

Have Richard Kilchesky's emails been subpoenaed by the SEC or any related entity in connection with the activities described in the Amended Complaint or in connection with any investigation thereof?

ANSWER:

INTERROGATORY NO. 12:

Has Richard Kilchesky ever been deposed by the SEC or any related entity in connection with the activities described in the Amended Complaint or in connection with any investigation thereof?

ANSWER:

INTERROGATORY NO. 13:

Please provide a detailed accounting of all alleged "ill-gotten gains" and any other damages, penalties, or disgorgement amounts claimed by the SEC for:

- a. Defendant Miller

- b. Jaberian
- c. Defendant Rajkaran

ANSWER:

INTERROGATORY NO. 14:

Please identify all persons who have been deposed and/or the subject of a subpoena for documents or testimony regarding the allegations in the Amended Complaint and/or the stocks/companies named in the Amended Complaint.

ANSWER:

INTERROGATORY NO. 15:

Please identify the names of all individuals or entities that purchased the stocks named in the Amended Complaint, as identified in connection with the investigation of the facts alleged in the Amended Complaint.

ANSWER:

INTERROGATORY NO. 16:

In a discussion with counsel for the SEC, Alyssa Qualls, in 2023, it was noted that Defendant Miller had asserted in 2019 that one of his clients named "Peter," residing in Denver, had generated several hundred thousand dollars through his consultations. Please identify this

individual and describe any efforts the Securities and Exchange Commission has made to identify this individual.

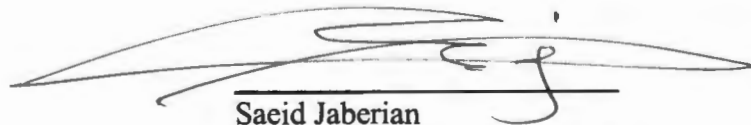
ANSWER:

INTERROGATORY NO. 17:

An individual with the handle "Pdgood" has been monitoring the Miller case for several years on the website IHUB. Has the Securities and Exchange Commission ascertained the identity of the individual known as Pdgood on IHUB, and if so, please identify this individual, and if not, please describe any efforts the SEC has made to identify this individual.

ANSWER:

Dated: 5/31, 2024



Saeid Jaberian
12601 Ridgemount Avenue W.
Minnetonka, MN 55305

Pro Se Defendant